

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF OHIO  
COLUMBUS DIVISION**

DIANE OWENS, Individually and on Behalf of All Others Similarly Situated,	)	No. 2:20-cv-03785-ALM-KAJ
	)	Judge Algenon L. Marbley
Plaintiff,	)	Magistrate Judge Kimberly A. Jolson
	)	
vs.	)	
	)	
FIRSTENERGY CORP., et al.	)	
	)	
Defendants.	)	
	)	
CHANA FRAND, Individually and on Behalf of All Others Similarly Situated,	)	No. 2:20-cv-04287-JLG-EPD
	)	Judge James L. Graham
Plaintiff,	)	Magistrate Judge Elizabeth Preston Deavers
	)	
vs.	)	
	)	
FIRSTENERGY CORP., et al.	)	
	)	
Defendants.	)	
	)	

**[PROPOSED] ORDER GRANTING LOS ANGELES COUNTY RETIREMENT  
ASSOCIATION'S MOTION FOR CONSOLIDATION OF RELATED ACTIONS,  
APPOINTMENT AS LEAD PLAINTIFF, AND APPROVAL OF LEAD PLAINTIFF'S  
SELECTION OF LEAD COUNSEL**

MURRAY MURPHY MOUL + BASIL LLP  
JOSEPH F. MURRAY (0063373)  
BRIAN K. MURPHY (0070654)  
1114 Dublin Road  
Columbus, OH 43215  
Telephone: 614/488-0400  
614/488-0401 (fax)

Liaison Counsel

ROBBINS GELLER RUDMAN  
& DOWD LLP  
DARREN J. ROBBINS  
MARK SOLOMON  
JASON A. FORGE  
TOR GRONBORG  
DANIELLE S. MYERS  
655 West Broadway, Suite 1900  
San Diego, CA 92101  
Telephone: 619/231-1058  
619/231-7423 (fax)

[Proposed] Lead Counsel for [Proposed] Lead Plaintiff

UPON CONSIDERATION OF the motion filed by Los Angeles County Employees Retirement Association for consolidation of related actions, appointment as lead plaintiff, and approval of selection of lead counsel, and good cause appearing therefore, it is hereby ordered:

1. The motion is GRANTED;

1. Pursuant to Rule 42(a) of the Federal Rules of Civil Procedure, *Owens v. FirstEnergy Corp.*, No. 2:20-cv-03785-ALM-KAJ; and *Frands v. FirstEnergy Corp.*; No. 2:20-cv-04287-JLG-EPD are consolidated as:

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF OHIO  
COLUMBUS DIVISION**

In re FIRSTENERGY CORP SECURITIES LITIGATION	)	Master File No. 2:20-cv-03785-ALM-KAJ
	)	<u>CLASS ACTION</u>
<hr/>		
This Document Relates To:	)	
ALL ACTIONS.	)	
<hr/>		

(a) The file in Case No. 2:20-cv-03785-ALM-KAJ shall constitute the master file for every action in the consolidated action. The Clerk shall administratively close the other action. When the document being filed pertains to all actions, the phrase “All Actions” shall appear immediately after the phrase “This Document Relates To:”. When a pleading applies to some, but not all, of the actions, the document shall list, immediately after the phrase “This Document Relates To:”, the docket number for each individual action to which the document applies, along with the last name of the first-listed plaintiff in said action;

(b) All securities class actions on behalf of purchasers of FirstEnergy Corp. securities subsequently filed in, or transferred to, this District shall be consolidated into this action. This Order shall apply to every such action, absent an order of the Court. A party objecting to such

consolidation, or to any other provisions of this Order, must file an application for relief from this Order within ten days after the action is consolidated into this action; and

(c) This Order is entered without prejudice to the rights of any party to apply for severance of any claim or action, with good cause shown;

2. Los Angeles County Employees Retirement Association is appointed Lead Plaintiff pursuant to 15 U.S.C. §78u-4(a)(3)(B)(iii); and

3. Los Angeles County Employees Retirement Association's selection of Robbins Geller Rudman & Dowd LLP as Lead Counsel is approved pursuant to 15 U.S.C. §78u-4(a)(3)(B)(v). Lead Counsel shall have the following responsibilities and duties on behalf of Lead Plaintiff and the putative class:

- (a) the preparation and filing of all pleadings;
- (b) the briefing and argument of any and all motions;
- (c) the conduct of any and all discovery proceedings and depositions;
- (d) settlement negotiations with counsel for defendants;
- (e) pretrial discovery proceedings, trial preparation, and trial of this matter; and
- (f) the supervision of all other matters concerning the prosecution or resolution of

this action.

IT IS SO ORDERED this \_\_\_\_ day of \_\_\_\_\_ 2019.

DATED: \_\_\_\_\_

THE HONORABLE ALGENON L. MARBLEY  
UNITED STATES CHIEF DISTRICT JUDGE